

TESTIMONY

By

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To

SENATE COMMITTEE ON

AGRICULTURE, NUTRITION AND FORESTRY

Washington, D.C.

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Good morning Mr. Chairman and Members of the Senate Committee on Agriculture, Nutrition and Forestry. My name is Ron Brichler, and I am president of Great American Insurance Company, Crop Insurance Division, headquartered in Cincinnati, Ohio. I appear here today in my capacity as Chairman of the American Association of Crop Insurers (AACI), which is the only national organization which represents all segments of the private sector delivery system for Federal Crop Insurance. AACI represents the reinsured companies, managing general agencies, private reinsurers, and the nationwide agent force that delivers the crop insurance program to farmers.

On behalf of the Board of Directors and members of AACI, I want to thank you for scheduling this hearing. It comes at a very critical time for the federal crop insurance program. Although the program has grown considerably and enjoys broad based support among farmers, ranchers and growers, as well as lenders, for providing improved risk management, the federal regulator, the Risk Management Administration (RMA), is about to engage in a fundamental change of policy that has not been authorized by Congress. It is embarking on this new policy contrary to established law and precedents of 25 years of the crop insurance program, 93 percent of the comments of its own rule-making process, and the objections of Congress as expressed in the Agriculture Appropriations Bill recently passed by the House of Representatives.

The new policy I am speaking of is the new rule that RMA is rushing to implement a national premium reduction program (PRP). RMA insists on doing this although:

- 1) the overwhelming opposition of over 93 percent of the 805 comments it received in its rule making process;
- 2) their inability to answer some of the very basic questions raised in these comments;
- 3) the very serious questions that have been raised about the discriminatory administration of their current PRP program that is limited to one start-up company;
- 4) their lack of resources to supervise the program they are rushing to put in place; and
- 5) the fact that they are not required by law to issue a final rule.

If RMA would objectively analyze the comments they have received in their rule-making process, they would realize their course of action would significantly impact the crop insurance program. Because we were concerned whether RMA would provide either Congress or the FCIC Board with a complete summary of these comments, we have provided our own summary and analysis, which we have included as Appendix A. Based on our experience in the business and the comments received by RMA, we predict the following outcomes will be the inevitable results of a PRP program that would be authorized by RMA's proposed rule as published in the Federal Register:

- 1) **Companies and agents will be forced to neglect the small family farmers and concentrate on competing for the largest and most profitable accounts.** Thus, the principle of serving all farmers without discrimination as to size and location will be inoperable.
- 2) **Companies will be forced to withdraw from some states, because it will not be profitable to compete in those states.** We have just two companies that write in every state now. The loss of one or both of these companies from any farm state would have serious consequences for the availability of crop insurance to farmers in those states. Again, the concept of universal availability of crop insurance to all farmers will be fatally compromised.
- 3) **The service to farmers, both true risk management counseling and claims adjusting, will rapidly decline.** Inferior claims adjustment will increase fraud and abuse to the extent that government will pay out millions more dollars than it should.
- 4) **It will be easy for the critics of farm program spending to argue for the elimination of a crop insurance program that no longer serves the family farmer.**

The Federal Crop Insurance Program Is a Success

With the RMA management consciously adopting policies that are certain to degrade the program, one might assume that it is not a very successful or popular program—a program that is not working for American farmers. Nothing could be further from the truth.

While congressional support for the federal crop insurance program historically has been strong and consistent, the Committee is to be specially commended for development and adoption of the Agricultural Risk Protection Act (ARPA) of 2000. ARPA provisions were designed to encourage farmers to buy higher coverage in decisions regarding risk protection and management. We believe ARPA is proving to be a success story and the Committee should be proud of this effort on behalf of all farmers, ranchers and growers.

USDA's crop insurance program participation data as reported by RMA confirms our belief regarding the value and contribution of ARPA to building a quality risk protection and management program for American farmers. For the first time, total premium was reported to have reached the four billion dollar mark in 2004, slightly exceeding \$4.1 billion. The average annual total premium for the four years since the passage of ARPA is reported to be more than 50 percent larger than the same statistic for the four preceding years. Net acres insured in 2004 are reported to have exceeded 221 million. Annually, the RMA data indicate that net acres insured have averaged more than 13 percent greater since ARPA than for the four-year period leading up to it.

The Federal Crop Insurance Program is the Envy of the World

It has taken decades to have the federal crop insurance program attain the current levels of participation and benefit for American farmers. And, while certainly there is room and opportunity to continue improving the program, today it stands second to none as a world-class agriculture risk management tool. Nations such as France are moving to develop their own program after having observed ours. Furthermore, it is noteworthy to acknowledge that a WTO panel publicly indicated the U.S. crop insurance program did not suppress world commodity prices. This revelation becomes yet another reason the Committee should be proud and protective of the federal crop insurance program that it has helped create.

A lot of people have contributed to the development and evolution of the modern crop insurance program, however, no effort has been greater than that made by Congress and members of this Committee. On behalf of the AACI membership and the farmers, ranchers and growers we serve, I want to take this opportunity to thank you for your support of a quality risk management program. Given the natural and global market elements they work and live with every day that are beyond their control, America's farmers, ranchers and growers deserve the predictability and protection of the risk management program you have provided.

The Federal Crop Insurance Program Now At Risk

In spite of all the progress made in recent years and despite the tremendous boost the program was given by the passage of ARPA in 2000, the crop insurance program is now at great risk. **Three initiatives taken by RMA could undermine in a few years all the gains made over the last 25 years.** Thus, they represent threats to the program and, thereby, to America's farmers, ranchers and growers.

These RMA initiatives are:

- 1. Pursuing a PRP that will discriminate against small and limited-resource farmers and create chaos in the marketplace.**
- 2. Promulgating regulations that make the crop insurance program more costly and nearly impossible for the traditional companies and agencies to deliver.**
- 3. Misusing data of a taxpayer-funded industry analysis to force cuts in the delivery system that will, if continued, adversely impact the delivery system that took 25 years to build.**

The Mission of Pursuing PRP. Since December 2002, RMA has been on a mission to force premium discounting on the Crop Insurance Delivery System. They have used an outdated section of the crop insurance law enacted in 1994 when reimbursement for delivering crop insurance was almost 32 percent of premium, to impose premium discounting on an industry that is now reimbursed at a rate of only 21 percent. They have taken this section of the law, Section 508(e)(3) of the Federal Crop Insurance Act (Act), and read it in a vacuum, without considering all other provisions of law. They have brushed aside complaints, including those received as a part of their rulemaking process, that the sole premium discount provider is discriminating against small farmers. They are ignoring their own regulations, which require that a company that offers insurance in a State must offer it to all eligible farmers in that State. They are ignoring their own Standard Reinsurance Agreement, which requires that companies do extensive training of both agents and loss adjusters. They are ignoring the weight of over 93 percent of the comments in their rule making process.

RMA asserts that the law requires they implement a PRP rule this year. We disagree. If they cannot devise a rule that prevents discrimination against small farmers and meets all of RMA's other requirements, limitations and procedures, RMA should not issue a final rule. Nor does the law require that they do so. The outdated provisions in a section of a 1994 law have been supplanted by a provision of ARPA enacted in 2000 that requires a carefully tailored pilot program for reductions in rates. Unlike the 1994 law, the 2000 law requires that a pilot program be implemented in 2002. Strangely, RMA has chosen to ignore the 2000 law, which is mandatory, and say that it is required to implement the outdated 1994 provision of law which is not mandatory. The contrasting provisions of the two statutes are included as Appendix B of this statement.

In the comments filed by AACI's counsel during RMA's rulemaking process the following major points were made.

1. RMA ignored the history and purpose of the crop insurance program in approving and operating the current premium discount program.
2. The approval of a premium discounter's application in 2002 was contrary to established law and regulations.
3. RMA approved the original premium-discounting program with no protections against discrimination and without adequate disclosure to the Board, including no disclosure of a pending 1999 regulation that would have prevented discrimination.
4. RMA never took any action when the original basis of its premium discount approval (direct sales of crop insurance on the internet) proved to be false and is compounding this negligence in going forward with the proposed rule.
5. RMA has repeatedly ignored industry complaints about the discriminatory and predatory nature of the current premium discount program.
6. The proposed rule's impact is inherently discriminatory and could subject USDA and the industry to massive class action lawsuits.
7. RMA sought to rush forward with a national premium-discounting program in 2004 and suspended its efforts only when forced by the FCIC Board to conduct a notice and comment rulemaking process.
8. RMA does not have the resources to prevent predatory and discriminatory practices under a PRP program. Thus it would create chaos in the marketplace.
9. RMA has already made a decision that it will go forward with its PRP program regardless of the comments received in the rulemaking process, thereby rendering the process meaningless. [In fact, 805 comments were submitted, of which over 93 percent indicated opposition to the PRP rule and program. See Appendix A for AACI's analysis of the comments.]

We wish to emphasize this last point. Public statements by RMA management indicate they are not taking the rulemaking process seriously, in our opinion. In a meeting with the industry on April 19, a high ranking RMA official stated that the agency would, in fact, implement a rule allowing premium discounting for the 2006 reinsurance year. Since this statement was made before the comment period was closed, it evidences a clear intent to ignore the comments that would be made in the rule-making process. Therefore, we appeal to Congress to direct RMA to halt PRP until there can be a thorough analysis of the program.

Furthermore, we are led to believe that RMA did not properly disclose facts, legal precedents, and prior proposed rules to the FCIC Board during consideration of the initial premium discounting proposal. We believe there were enough irregularities in this process to warrant an investigation as to the role of RMA management in the premium discounting approval and oversight process.

In our efforts to demonstrate why a premium discounting program will force crop insurance agencies to discriminate against small farmers or go out of business, we have tried to get RMA to focus on the actual books of crop insurance agencies. They have refused to do so.

Therefore, we have attached as Appendix C data from the Sherry Wegner Agency in Glasscock, Texas. It shows that the agency's average cost of serving a federal crop insurance policy is approximately \$300. It is undisputed in the industry that it is just as expensive to service a small policy as a large one. The Wegner Agency has provided a printout of the actual policies sold by the Agency, with the names of policyholders deleted for privacy reasons. If you will focus on the next to last column on the page, you will find the actual commission paid to the Agency. This data demonstrates that many of the commissions paid are substantially below \$300. In fact, 58 percent of them are less than \$300.

In the interest of full disclosure, it should be pointed out that some farmers have multiple policies. However, the size of the smaller policies indicates that many of the farmers insured by the Wegner Agency are indeed small farmers. The Wegner Agency remains profitable because it has some larger policies. Clearly, if a premium discounter is allowed to cherry pick the larger and more profitable policies of the Wegner Agency, the Agency will no longer be able to serve small farmers. It would go out of business. It is this business reality that we have never been able to get RMA to address. We appeal to Congress to help RMA understand it.

RMA's response to our concerns about discrimination may be that the proposed rule does have some language that prohibits discrimination. However, we believe that RMA has already demonstrated its unwillingness to enforce this new language by its record of allowing discrimination under the current premium-discounting program. Moreover, as several comments on the proposed rule have pointed out, RMA does not have the extensive resources that would be required to enforce such a rule in order to avoid offering discounted premiums to any but the largest farmers. The only way that this kind of evasion can be avoided is for RMA to have a large market conduct enforcement division. **Congress should demand to know where the resources to enforce the new rule are going to come from.**

Just as important, no rule can trump the laws of economics. No rule can address the simple statement of reality demonstrated by the data provided by the Wegner Agency. A premium-discounting program will make crop insurance unavailable to thousands of the nation's small farmers.

RMA is imposing additional burdens on the private sector.

To implement the Federal Crop Insurance Act – which includes provisions to help control, reduce and eliminate fraud, waste, and abuse – RMA, working with the authority granted by the FCIC, has developed and finalized certain critical changes to the Basic Provisions for the 2005 crop insurance year. In addition, RMA has made other regulatory changes in the new Standard Reinsurance Agreement (SRA) that was adopted in 2004. However, in many instances, this additional paperwork and regulatory burdens are making the program more expensive and nearly impossible to deliver, especially in a manner that has been most beneficial to farmers.

While no one condones fraud, waste, and abuse, some of the regulations adopted by RMA are excessively rigid and can result in punitive damages. For example, some of the changes do not adequately allow for or accommodate common, unintended mistakes and errors of data entry by either farmers or agents and companies, even when there is no adverse pattern of practice. Nonetheless, under the new provisions, these everyday innocent clerical mistakes would result in substantial penalties at claim filing. The implementation and administration of these regulations, especially after the changes made in 2004, are reaching the point of being overly burdensome and wasteful. Industry resources, both human and capital, are already stressed as a result of the increasing complexity of the insurance program of crop and livestock enterprise risk management.

Additionally, the changes establish a discriminatory relationship between USDA agencies regarding the treatment of farmers. For example, reporting errors in the Farm Service Agency (FSA) records, when discovered, are simply corrected. However, reporting errors in RMA records are not correctable in some instances and penalties can be assessed. This development is occurring in spite of the fact that ARPA called for greater cooperation in reporting and recordkeeping consistency between the two agencies.

No one in the crop insurance industry condones fraud. However fraud identification and control is improving. This committee supported legislation that has assigned greater attention and resources to researching and ending fraud. RMA and the administration have acted aggressively with emphasis on data mining and other means to identify and punish instances of fraud. While, in all likelihood, all fraud has not been stamped out, the general environment is greatly improved and continues to get better. Currently the greatest threat to the integrity of the program is the attempt of RMA to force down reimbursements to the companies and their agent force to a level that makes it impossible to properly service the business.

Our concern in AACI is that RMA has instituted so many rules and regulations because of the fraudulent acts of a few that the honest producers and agents are overwhelmed with procedures and vulnerable to severe penalties. RMA's response to every problem is to pile a new requirement on top of the mountain of existing regulations.

We believe RMA is not uniformly applying regulations.

While continuing to pile more regulatory burdens and hardships on the companies and agents that have faithfully delivered the program for decades, they have another standard for the sole premium discounter. Nothing is more basic than the extensive requirement for training agents and adjusters. However, RMA appears to have excused the premium discounter from this requirement. By going to the premium discounter's website, it is apparent that the premium discounter does not even have one loss adjuster in 8 of the 15 states in which it is selling crop insurance.

We in the crop insurance business know that sales are the easy part of the business and the difficult and burdensome part of the business is the service part. That is why several companies have been forced to leave the business. The companies who are successful have invested millions of dollars in improving back office operations as well as in agent and adjuster training. As you can imagine, we are upset when RMA allows a company to offer premium discounts without bearing the expense of servicing the businesses.

RMA's continuing efforts to act as cheerleader rather than regulator for the premium discounter is especially disturbing. In an unsigned briefing paper delivered by the RMA to the House Appropriations Committee on May 13, RMA stated "The allegation that PRP is being offered only to large farmers and not small farmers is untrue. In 2004, approximately 2/3rds of the policies sold by Crop1 were for 250 acres or less." **This is a deceptive use of statistics.** A policy is not a farmer. Very few farmers have one policy. A farmer frequently has multiple county crop policies for the same crop and most farmers have more than one crop. One of the largest national crop insurance companies, who has a long tradition of serving farmers of all sizes in every state in which it does business, has indicated that 89 percent of its policies averaged 136 acres. Also, the RMA statement is contrary to all anecdotal evidence and the statements of 56 commenters in the PRP rulemaking process.

In any event, other companies report that, on average, the size of policies being transferred from their companies to the premium discounter's company is twice as large as their average policy.

Misusing Data to Push RMA's Agenda. Applying this methodology RMA made unwarranted cuts in compensation in the 2005 SRA based on a misuse of certain data from an analysis of the crop insurance industry.

At the time that RMA released its proposed new SRA, we were told that it was based in part on a study done by Milliman USA under a RMA contract.

On March 3, 2005, RMA Administrator, Ross Davidson, appearing before the House Agriculture Appropriations Subcommittee said the Milliman work concluded the industry

received an “average rate of return of 15.8 percent over the years 1989-2002 when the average reasonable rate of return was only 14.0 percent.”

Both the private industry and Congress have tried unsuccessfully to obtain this study. The private sector filed a request under the Freedom of Information Act (FOIA) on April 27, 2004. Members of the House Agriculture Committee, Mr. Peterson and Mr. Pomeroy, requested a copy of the study in a hearing held on July 21, 2004.

Nearly a year later, we still do not have the complete study. We received only part of three of the 28 Milliman reports. In the reports we received, there were serious deletions. We had stipulated that private confidential business information should be redacted. However, we do not believe wholesale deletions of entire sections of 140 pages are appropriate. We have appealed RMA’s actions, but our efforts have been stonewalled.

We ask that this Committee join us in demanding that RMA cease the suppression of this information for which it paid over a million dollars in taxpayer money.

Upon reading the partial report that RMA finally released to us, it becomes abundantly clear the authors repeatedly qualified a key statement referenced at the March 3, 2005 hearing by the RMA Administrator. The following quotes from the November 11, 2002 Milliman USA report to RMA on Historic Rate of Return Analysis are noteworthy as well as instructive:

“Thus, while MPCCI insurers have earned a return somewhat in excess of the cost of capital, the returns are somewhat volatile as evidenced by the fact that in the single catastrophe year, the overall rate of return was -15.6% (negative 15.6%). In fact, we would caution against drawing any strong conclusions on the adequacy or excessiveness of the historical returns based on a sample of thirteen years of data, in light of the fact that only one of those years is a catastrophe year. Had there been a second catastrophe year in the sample similar in magnitude to 1993, the average return over the period would have been below 14%.” [Pages 4-5]

“We caution that actual returns could deviate significantly from the expected returns because of unexpected events. Therefore, a better measurement of whether providers have been reasonably compensated is by comparing mean values over the sample period, and by observing the pattern of difference between actual and reasonable rate of return. ... As can be seen in the table (Table 13, Page 37), the actual rate of return is 1.8% larger than the reasonable rate of return for all years, however, the standard deviation of the difference is 10.2%. **Given the magnitude of the standard deviation, the difference does not appear to be statistically significant.** (Emphasis added) In addition, as noted earlier, this result is quite sensitive to the occurrence of catastrophe years in the sample period. **For example, if there had been a second catastrophe year equivalent to 1993 in this sample period, the historical return would have been below 13.7%.** (Emphasis added) [Pages 37-38]

“As with most lines of insurance that have a significant catastrophe exposure, insurers expect to earn significant profits in non-catastrophe years and significant losses in years with catastrophes. As a result, average returns over relatively short sample periods are not necessarily indicative of the long-term pattern of returns. Given the experience in multi peril crop insurance over the past 13 years, we would suggest that the historical returns reported herein would tend to overstate long term returns if the frequency of catastrophes is greater than one in thirteen years, and understate such returns if the frequency is lower than one in thirteen.” [Page 38]

In fact, the years selected for the study, 1989-2001, were carefully picked. If the years 1988 and 2002 had been included, the result would have been vastly different. For 1988, a major drought year, the loss ratio was 2.41, the largest in the history of the program. And 2002 was a major loss year with a loss ratio of 1.39. Thus, RMA skewed the result of their study by picking a period in which crop insurance has a loss in only 1 of 13 years (1989-2001), rather than a more representative period of 1988-2002, when crop insurance experienced a loss in three of fifteen years.

Another subject that is important in any profit analysis is the expense side of the equation. The November 11, 2002 Milliman USA report addressed this subject also. Below are several important expense related statements from that report.

“...the FCIC (Federal Crop Insurance Corporation) compensates insurers for the cost of selling and servicing the coverage through the payment of an administrative and operating (A&O) subsidy. This A&O subsidy is intended to cover all costs associated with the sale and servicing of crop insurance policies, excluding, of course, losses. This raises at least two important issues as regards profitability analysis. First, depending on the level of the A&O subsidy relative to actual incurred expenses, there may be a profit or a loss to insurance providers attributable to the subsidy itself. Second, when evaluating crop insurance expense ratios relative to expenses for other lines of insurance, it is imperative to adjust the ratios to put them on a comparable basis.” [Page 10]

“First, and perhaps most important, the GAO concluded that an expense reimbursement equal to 24 percent of premium would be reasonable in light of their audit of actual company expenses. Currently, the SRA (Standard Reinsurance Agreement) provides for an A&O subsidy ranging from 21 to 24.5 percent of premium, depending on the fund and plan of insurance. As a consequence, assuming expenses as a percent of premium have remained constant over time, the current A&O subsidy would not be viewed as excessive, regardless of the historical levels of the subsidy.” [Page 12]

“Second, we found several of the GAO conclusions and recommendations inconsistent with the objective of delivering multi peril crop insurance through the

private sector. For example, expenses related to acquiring a competitor's book of business, or paying incentive compensation to employees, are parts of the cost of doing business in the private sector. If crop insurance is to be delivered through this mechanism, then insurers will have to compete for resources to support crop insurance on the same terms as would any other business activity." [Page 12]

"Finally, the GAO statement that the expense reimbursement could be reduced in the future because crop prices and premiums will increase must be considered in light of several facts. First, a substantial share of insurer expenses is directly dependent on premium. Agent commissions, which represent a significant portion of expenses (more than half according to the GAO report), are usually a fixed percentage of premiums. As to other expenses, a substantial portion of these are related to employment costs, which tend to increase faster than the general level of prices. Finally, premium increases may reflect expected loss increases, which in turn might result in higher loss adjustment expenses. This is especially true for the introduction of new types of coverage such as revenue assurance. Thus, it is unclear whether increases in the average premium per policy would be sufficient to offset the cost increases associated with higher expenses for labor costs." [Pages 12-13]

"In contrast to the GAO report's suggestion that the A&O subsidy has exceeded actual expenses, there are data from insurer annual statements that indicate the opposite – that is, that the expense reimbursement has fallen short of actual expenses. These data are available for MPCIR for all years from 1992 to the present, from the statutory financial reports insurers file with regulators." [Page 13]

We believe research of this nature is very important and can be useful in developing improved insights and understandings of the crop insurance industry. However, taking information out of context and attempting to have interrelated findings stand-alone helps create and perpetuate misconceptions—in this instance about the rate of return in the crop insurance industry.

We Need the Committee's Help to Restore Progress in the Crop Insurance Program

Over the 25 years of this program, we have had to overcome serious obstacles and setbacks to achieve the current program. However, during this time RMA management worked cooperatively with the industry to improve the program. Now, we in the private sector feel that we are always trying to fight off new RMA program changes that would seriously undermine the program. Thus, we are going backward rather than forward for the first time in the modern program's history. We ask the Committee's help in restoring forward momentum to the crop insurance program. In the case of the PRP Program that means conducting an independent analysis to determine whether the provision should be repealed. Therefore, we request that this committee write a letter to the Secretary of Agriculture urging a delay in the implementation of the PRP rule until an independent analysis can be done by the Government Accountability Office.

Appendix A

American Association of Crop Insurers (AACI) Analysis of Public Comments on Proposed PRP Rule

In response to the Federal Register notice and request of February 24, 2005, Vol. 70, No. 36, page 9001, submitted by the Federal Crop Insurance Corporation (FCIC) to amend the General Administrative Regulations (7CFR part 400, subpart V), the Risk Management Agency (RMA) received 805 public comments. Twenty-eight states and the District of Columbia are represented by the comments received. These comments have come from the full spectrum of the crop insurance industry, including companies, local agencies, agents, farmers, local banks, as well as industry associations. In analyzing these comments, AACI found that **93 percent of all comments received expressed opposition to the implementation of the proposed rule, the Premium Reduction Plan as a whole or both.**

Table 1 shows the distribution of comments among key participants—agents, farmers, companies and others. Agents accounted for 75 percent of all comments, of which 95 percent were opposed to the rule, PRP or both. The second largest category of participants were farmers accounting for 12 percent of the total comments, of these participants 81 percent expressed opposition to the proposed rule, the PRP program or both. Table 2 shows the comments submitted by individuals in the states in which the single PRP provider is licensed. These 14 states accounted for 69 percent of all comments, of which 95 percent were opposed to the proposed rule, the PRP program or both. Table 3 shows the breakdown of comments submitted for all states. The state which had the largest number of participants was Kansas with 147 comments, 18 percent of all comments received. Table 4 shows the distribution for Kansas participants by participant category and by position on the rule.

The most frequent reason given for opposing the new rule is that it would lead to discrimination against small, minority and limited resource producers in the industry and “cherry-picking” of the larger farm accounts. The reduction in agent commissions (which has been a part of the existing PRP provider’s business plan) raised a great deal of concern as well. Many agents stated that should PRP be expanded to the entire industry, they would no longer be able to sell and service crop insurance due to the necessary reduction in commissions. Indeed some of the very companies that provide coverage nationally point out that with the implementation of this rule they would likely be forced to pull out of some high risk states. This sentiment was expressed by the only two companies that service policies nationally.

Fifty-six of the participants opposed to the expansion of PRP detailed instances of discrimination by the industry’s only PRP discount provider, Crop1. Many farmers and agents wrote that only the largest producers in their area were being marketed to by the PRP discount provider.

Several of the commentators raised operational questions about the rule and about RMA's ability to enforce it. A selection of these questions is listed below and are grouped alphabetically by author.

Greg Burger, President Farmers Crop Insurance Alliance

"RMA is proposing that the PRP be instituted for all premium written by the carrier regardless of crop or state location. Some companies only write in the Midwest where the underwriting gain has been good. In states where the results have been less favorable, sometimes the only reason to write there is for the A&O subsidy. A company may consider withdrawing from such states to keep rates competitive in profitable states. Is RMA concerned that the few companies writing in a number of these unpopular states might withdraw to file a PRP to compete in the profitable Midwest?"

"The RMA is requiring that the company not reduce its service to the insureds. How will RMA audit to determine that service is remaining constant to their producers? Does RMA have standards of service developed?"

Senator Chuck Grassley (R-IA)

"Finally, on page 90060 in the preamble RMA states, 'Further, the workload on RMA and approved insurance providers to identify cost allocations and determine whether the projected cost savings from efficiencies are reasonable and correspond to the premium reduction in the state would be enormous.' Yet your response to my second question states: 'Therefore, in accordance with sections 400.716(h) and 400.719(a)(6) of the proposed rule, RMA would track the expense performance of the approved insurance provider at the state level to ensure that costs are reduced in each state by an amount that is at least equal to the premium reduction.' I disagree that sections 400.716(h) and 400.719(a)(6) say anything about a state level accounting requirement. Yet it is clear from your response that RMA intends to enforce an 'enormous' expense on the industry.

How RMA chooses to administer the program is critical. Yet, it is clear to me that RMA does not conceptually understand how to do this. Moreover it appears RMA wishes to foist huge expenses on the industry. Therefore I urge RMA to take more time and fully understand what it is proposing before it issues a final rule. Your staff has indicated that it intends to publish a final rule by the end of June. I do not understand your staff's urgency. Consider the comments carefully and proceed cautiously, if at all."

Senator Tom Harkin (D-IA), Ranking Democratic Member, Senate Committee on Agriculture, Nutrition and Forestry

"As written, the proposed rule requires that companies offer the PRP product with the same level of discount to farmers in all states that they serve, but they do not appear to preclude companies from dropping states entirely if they determine they cannot operate profitably in those states under the reduced A&O reimbursement of PRP products. I would expect little or no impact on the coverage provided to farmers in my state of Iowa, at least for major crops, where nearly all companies now operate profitably because of

historically low loss ratios. However, there are currently 12 states which are served by three or fewer crop insurance companies. Cost-reduction pressures could result in several additional states with higher loss ratios being dropped by existing companies, thus jeopardizing the quality of the service they now receive and undermining the national character of crop insurance, which is essential for its future.”

Steve Harms, President, Rain & Hail LLC

“Section 400.720(e) – This item indicates that all producers insured by the provider will “automatically receive” the premium reduction contained in the approved PRP plan. This language does not go far enough to ensure discrimination does not take place.

Independent agents frequently write for multiple companies. What conduct is expected of an agent that writes for a PRP company and a non-PRP company? Should said agent offer PRP only to select customers? What if an agent writes for a PRP company with a 1% discount and one with a 4% discount – which plan of insurance should said agent offer to customers? RMA should define agent rules of engagement for both of these circumstances. Otherwise, discrimination among farmers will darkly tarnish the Federal crop insurance program.”

“Section 400.717 – We support the statutory requirement which states that the discount must correspond to the efficiency. RMA has added the phrase “correspond to the location” to its proposed requirements. In the preamble, RMA goes to great lengths to say it would be challenged by state level accounting to determine the efficiency and the corresponding discount. We agree RMA does not have the financial or technical resources to make these determinations. However, we submit that by adding the phrase “to the location”, RMA is in effect requiring state level accounting. How else will RMA be able to determine if the efficiency and discount correspond “to the location?”

L. Charles Landgraf, Counsel, Independent Insurance Agents and Brokers of America

“Reduced agent compensation could increase instances of novice agents engaging in practices such as illegal rebating and tying arrangements. Because state licensing requirements vary substantially from state to state, agribusiness firms that sell seeds and equipment could easily enter the business of crop insurance in some states. These firms have sources of profit other than agent commissions and could thereby help AIPs offer crop insurance for lower premiums by servicing policies for less compensation than the current agent workforce. However, these firms lack the experience and skill of agents in the current delivery system and have incentives to bundle lower premiums with other goods and services. As a result, producers could become vulnerable to illegal rebates and tying arrangements.

The proposed rules contain no mechanisms to detect and prevent these anti-consumer practices under PRPs. Creation of an enforcement office would be necessary to monitor anti-consumer practices and address producer complaints. The RMA, however, does not have the resources to establish such an office.”

Ben Latham, President, Producers Ag Insurance Group

“Producers Ag feels that little or no study has been done to anticipate what effects widespread adoption of PRP might have on the public/private partnership that has been so successful in reducing farmers’ reliance on ad hoc relief. RMA admits in the proposed rule on Page 9005 that, “diverse plans raised issues or problems that had not previously been considered by RMA...” We feel strongly that before RMA drastically changes such a successful program that exhaustive research should be undertaken so RNA is not surprised again. The timeline RMA has set forth for publishing a new PRP rule is woefully short and much more thoughtful study and back-and-forth dialogue should take place.”

Mike Miller, President, Heartland Crop Insurance, Inc.

“Heartland could be in favor of an alternative process where an Insurance Provider is required to prove an ability to operate under the A&O for no less than a year prior to having a premium reduction plan in place. This plan would then be based off actual versus projected efficiencies. There are too many variables involved in accurately predicting the amount of savings proposed in a premium reduction plan. The Financial Reserve Plan in the proposed rule would not account for any major misrepresentation in a premium discount plan and is not enough deterrence for Insurance Providers not hitting their intended saving percentages. If such a plan is necessary, the Insurance Provider should be accountable for the entire amount of the proposed premium savings and be willing to provide access to those additional funds.”

“We feel RMA has underestimated the amount of resources necessary to properly regulate the Insurance Providers who have accepted premium reduction plans. The lack of regulation on the current premium reduction plan in place gives us cause for concern and we would like to see a more detailed outline of how RMA plans on improving its oversight capabilities.”

Daniel N. Rosenstein, Counsel, Rural Community Insurance Services (“RCIS”)

“The Proposed Rule is silent as to the meaning of the term “portion.” A portion is vague, nonspecific amount that is “a part of the whole.” Webster’s Third Internatl. Dictionary at 1789 (Rev. Ed. 1993). Thus a “portion” may vary from one percent to 99 percent. May 99 percent of RCIS savings be predicated on reduced compensation? If not, what “portion” of savings may be associated with “a reduction in compensation”?”

Steven C. Rutledge, President, Farmers Mutual Hail Insurance Company of Iowa

“In reviewing the contents that are required for a revised Plan of Operations, the proposal stipulates that the approved insurance provider must certify that a copy of its marketing strategy be sent to all State Departments of Insurance where it does business. In addition, the approved insurance provider is to provide RMA with a copy of any responses that it

receives back from the states. If one or more states would deny the marketing strategy as proposed by an approved insurance provider, would this denial eliminate the approved provider's ability to offer a premium reduction plan since the premium reduction plan is to be offered in all states where the approved insurance provider is doing business?"

Sam Scheef, President, ARMtech Insurance Services, Inc.

"1. The procedural determination of what is to be allowed as A&O income, and what must be accounted for as an A&O expense, raises several questions. Any departure from the practice of allowing only A&O income from FCIC to be considered when determining an "efficiency" for purposes of PRP would contradict legislation and create opportunities for abuse. Allowing any A&O expenses to be excluded from consideration when determining the discount would open the door to creative accounting schemes detrimental to the stability of the Approved Insurance Provider (AIP) and the delivery system overall as well as RMA's ability to regulate the system.

The FR Release (p. 9005) quotes section 508(e)(3) of the Act to the effect that "the approved insurance provider must provide sufficient documentation to demonstrate that not only can the approved insurance provider operate within its administrative and operating expense reimbursement, but it can also reduce its costs to a level below the amount received from the RMA for administrative and operating expense reimbursement." Thus ceding commissions or any other form of income should not be allowed as A&O income for the purpose of qualifying for a premium reduction plan. If it allows AIPs to consider any other forms of income beyond FCIC-paid expense reimbursement in qualifying for a PRP, FCIC would open the door to situations where no real efficiency exists and would invite reinsurance schemes designed to artificially inflate an AIP's ceding commission in order to provide sufficient 'income' for the AIP to demonstrate an efficiency.

2. Reporting requirements likewise are flawed. For instance, in describing the requirements for semi-annual reports, the FR Release (p. 9005) states that it must contain "the average number of acres insured under all policies by State before and after implementation of the premium reduction plan." This could create inaccuracies where a producer has policies in different counties. At a minimum, the requirement should be restated to include "the average number of acres on a crop, county, and entity basis insured under all policies by State before and after implementation of the premium reduction plan," and should also require premium growth by crop in each state. In addition, these semi-annual reports should be made available to the public."

Thomas P. Zacharias, Executive Vice President, National Crop Insurance Services

"In response to the PRP proposal, we submit that the industry needs greater incentives, not fewer, to operate in the less profitable states. While several the members of the industry have been willing to make a commitment to serve all farmers, regardless of their risk, in the states in which they operate, the opportunity for some companies to use the PRP program to compete for good business in the more profitable states may create financial strains that undermine the industry's ability to maintain its commitment to

universal availability. RMA and FCIC need to consider the impact of the PRP proposal on the industry, and also consider what can be done to improve the incentives for all members of the industry to participate in the less profitable states and to accept a fair share of the less desirable business in the states where they currently operate. This is not a simple task. We request that RMA and FCIC engage in further study of the operation of the program as a whole in order to determine what actions or incentives will best serve the public policy goals of the corporation and help to ensure the long term stability of the industry.”

Table 1: Public Comments on Proposed PRP Rule, Distribution by Category and Position.

| Category | | | Position on Rule | | | | | |
|---------------------|------------|------------|------------------|----------|------------|-----------|-----------|----------|
| | | | Pro | | | Con | | NA |
| Group | Number | Percent | Number | Percent | Number | Percent | Number | Percent |
| Farmers | 97 | 12 | 16 | 16 | 81 | 84 | 0 | 0 |
| Agents | 603 | 75 | 25 | 4 | 574 | 95 | 4 | 1 |
| Companies | 9 | 1 | 1 | 11 | 8 | 89 | 0 | 0 |
| Other* | 63 | 8 | 1 | 2 | 60 | 95 | 2 | 3 |
| No ID # | 33 | 4 | 2 | 6 | 27 | 82 | 4 | 12 |
| | | | | | | | | |
| TOTAL Number | 805 | 100 | 45 | 6 | 750 | 93 | 10 | 1 |

* Other includes trade associations, agent organizations, members of congress and local banks.

no ID includes comments with insufficient information to determine a category.

Table 2: Public Comments on Proposed PRP Rule, Distribution by PRP States* and Position.

| PRP States | | | Position on Rule | | | | | |
|--------------|------------|------------------|------------------|----------|------------|-----------|---------------|----------|
| Name | Number | Percent of Total | Pro | | Con | | Not Specified | |
| | | | Number | Percent | Number | Percent | Number | Percent |
| ID | 5 | 1 | 0 | 0 | 5 | 100 | 0 | 0 |
| IL | 32 | 4 | 0 | 0 | 31 | 97 | 1 | 3 |
| IN | 12 | 1 | 3 | 25 | 9 | 75 | 0 | 0 |
| IA | 83 | 10 | 9 | 11 | 73 | 88 | 1 | 1 |
| KS | 147 | 18 | 3 | 2 | 144 | 98 | 0 | 0 |
| MI | 11 | 1 | 0 | 0 | 11 | 100 | 0 | 0 |
| MN | 50 | 6 | 3 | 6 | 47 | 94 | 0 | 0 |
| MO | 5 | 1 | 0 | 0 | 4 | 80 | 1 | 20 |
| NE | 61 | 8 | 3 | 5 | 58 | 95 | 0 | 0 |
| ND | 83 | 10 | 0 | 0 | 81 | 100 | 2 | 2 |
| OH | 3 | 0 | 1 | 33 | 2 | 67 | 0 | 0 |
| SD | 26 | 3 | 0 | 0 | 26 | 100 | 0 | 0 |
| TX | 21 | 3 | 3 | 14 | 18 | 90 | 0 | 0 |
| WA | 1 | 0 | 0 | 0 | 1 | 100 | 0 | 0 |
| WI | 14 | 2 | 0 | 0 | 14 | 100 | 0 | 0 |
| TOTAL | 554 | 69 | 25 | 5 | 524 | 94 | 5 | 1 |

* PRP States are those in which the single approved PRP provider is licensed.

Table 3: Public Comments on Proposed PRP Rule, Distribution by State and Position.

| State | | | Position on Rule | | | | | |
|----------------|------------|------------------|------------------|----------|------------|-----------|---------------|----------|
| | | | Pro | | Con | | Not Specified | |
| Name | Number | Percent of Total | Number | Percent | Number | Percent | Number | Percent |
| AR | 1 | 0 | 0 | 0 | 1 | 100 | 0 | 0 |
| CA | 1 | 0 | 0 | 0 | 1 | 100 | 0 | 0 |
| CO | 2 | 0 | 0 | 0 | 2 | 100 | 0 | 0 |
| DC | 7 | 1 | 0 | 0 | 6 | 86 | 1 | 14 |
| FL | 2 | 0 | 0 | 0 | 2 | 100 | 0 | 0 |
| GA | 2 | 0 | 0 | 0 | 2 | 100 | 0 | 0 |
| ID | 5 | 1 | 0 | 0 | 5 | 100 | 0 | 0 |
| IL | 32 | 4 | 0 | 0 | 31 | 97 | 1 | 3 |
| IN | 12 | 1 | 3 | 25 | 9 | 75 | 0 | 0 |
| IA | 83 | 10 | 9 | 11 | 73 | 88 | 1 | 1 |
| KS | 147 | 18 | 3 | 2 | 144 | 98 | 0 | 0 |
| KY | 2 | 0 | 0 | 0 | 2 | 100 | 0 | 0 |
| LA | 7 | 1 | 0 | 0 | 7 | 100 | 0 | 0 |
| ME | 2 | 0 | 0 | 0 | 2 | 100 | 0 | 0 |
| MI | 11 | 1 | 0 | 0 | 11 | 100 | 0 | 0 |
| MN | 50 | 6 | 3 | 6 | 47 | 94 | 0 | 0 |
| MS | 1 | 0 | 0 | 0 | 1 | 100 | 0 | 0 |
| MO | 5 | 1 | 0 | 0 | 4 | 80 | 1 | 20 |
| MT | 2 | 0 | 0 | 0 | 2 | 100 | 0 | 0 |
| NE | 61 | 8 | 3 | 5 | 58 | 95 | 0 | 0 |
| NJ | 1 | 0 | 0 | 0 | 1 | 100 | 0 | 0 |
| NC | 1 | 0 | 0 | 0 | 1 | 100 | 0 | 0 |
| ND | 83 | 10 | 0 | 0 | 81 | 98 | 2 | 2 |
| OH | 3 | 0 | 1 | 33 | 2 | 67 | 0 | 0 |
| OK | 1 | 0 | 0 | 0 | 1 | 100 | 0 | 0 |
| SD | 26 | 3 | 0 | 0 | 26 | 100 | 0 | 0 |
| TX | 21 | 3 | 3 | 14 | 18 | 86 | 0 | 0 |
| VA | 3 | 0 | 0 | 0 | 3 | 100 | 0 | 0 |
| WA | 1 | 0 | 0 | 0 | 1 | 100 | 0 | 0 |
| WI | 14 | 2 | 0 | 0 | 14 | 100 | 0 | 0 |
| None Specified | 216 | 27 | 20 | 9 | 192 | 89 | 4 | 2 |
| TOTAL | 805 | 100 | 45 | 6 | 750 | 93 | 10 | 1 |

**Table 4: Public Comments on Proposed PRP Rule,
Distribution for Kansas, by Category and Position.**

| Category | | | Position on Rule | | | |
|--------------|------------|------------|------------------|----------|------------|-----------|
| | | | Pro | | Con | |
| Group | Number | Percent | Number | Percent | Number | Percent |
| Farmers | 54 | 37 | 2 | 4 | 52 | 96 |
| Agents | 88 | 60 | 1 | 1 | 87 | 99 |
| Companies | 0 | 0 | 0 | 0 | 0 | 0 |
| Other | 5 | 3 | 0 | 2 | 5 | 100 |
| TOTAL | 147 | 100 | 3 | 2 | 144 | 98 |

Appendix B

Two Authorities for Premium Discount

7 U.S.C. 1501 et seq., Chapter 36 Sec. 1508(e)(3) of the Federal Crop Insurance Act as Amended

[P.L. 103-354 Federal Crop Insurance Reform and Department of Agriculture Reorganization Act of 1994]

(3) Premium reduction

If an approved insurance provider determines that the provider may provide insurance more efficiently than the expense reimbursement amount established by the Corporation, the approved insurance provider may reduce, subject to the approval of the Corporation, the premium charged the insured by an amount corresponding to the efficiency. The approved insurance provider shall apply to the Corporation for authority to reduce the premium before making such a reduction, and the reduction shall be subject to the rules, limitations, and procedures established by the Corporation.

7 U.S.C. 1501 et seq., Chapter 36 Sec. 1523(d)(1) of the Federal Crop Insurance Act as Amended

[P.L. 106 – 224 Agricultural Risk Protection Act of 2000 (ARPA)]

(d) Premium rate reduction pilot program

(1) Purpose

The purpose of the pilot program established under this subsection is to determine whether approved insurance providers will compete to market policies or plans of insurance with reduced rates of premium, in a manner that maintains the financial soundness of approved insurance providers and is consistent with the integrity of the Federal crop insurance program.

(2) Establishment

(A) In general

Beginning with the 2002 crop year, the Corporation shall establish a pilot program under which approved insurance providers may propose for approval by the Board policies or plans of insurance with reduced rates of premium -

- (i) for one or more agricultural commodities;
- and

- (ii) within a limited geographic area, as proposed by the approved insurance provider and approved by the Board.

(B) Determination by Board

The Board shall approve a policy or plan of insurance proposed under this subsection that involves a premium reduction if the Board determines that –

- (i) the interests of producers are adequately protected within the pilot area;
- (ii) rates of premium are actuarially appropriate, as determined by the Board;
- (iii) the size of the proposed pilot area is adequate;
- (iv) the proposed policy or plan of insurance would not unfairly discriminate among producers within the proposed pilot area;
- (v) if the proposed policy or plan of insurance were available in a geographic area larger than the proposed pilot area, the proposed policy or plan of insurance would –
 - (I) not have a significant adverse impact on crop insurance delivery system;
 - (II) not result in a reduction of program integrity;
 - (III) be actuarially appropriate; and
 - (IV) not place an additional financial burden on the Federal Government; and
- (vi) the proposed policy or plan of insurance meets other requirements of this chapter determined appropriate by the Board

(C) Time limitations and procedures

The time limitations and procedures of the Board established under section 1508(h) of this title shall apply to the proposal admitted under this subsection.

Appendix C

SHERRY WEGNER AGENCY/GLASSCOCK BRANCH

CROP YEAR 2004

| | |
|-------------------|----------------|
| TOTAL MPC I SALES | \$1,297,332.00 |
|-------------------|----------------|

| | |
|------------------------|--------------|
| TOTAL MPC I COMMISSION | \$154,047.28 |
|------------------------|--------------|

| | |
|---------------------|--------------|
| TOTAL GROSS EXPENSE | \$135,327.00 |
|---------------------|--------------|

| | |
|---|------------|
| Less expenses not related to MPC I Sales & Service | -85,837.47 |
|---|------------|

| | |
|---------------------------|-------------|
| NET COST OF MPC I SERVICE | \$49,489.59 |
|---------------------------|-------------|

NUMBER OF MPC I POLICIES = 165

AVERAGE COST OF SERVICING AN MPC I POLICY

$$49,489.59 / 165 = \$299.93$$

2004 Agency Commission Register

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For FCIC Accounting Cutoff: March 11, 2005

Sherry Wegner Agency - Glasscock (481490)

Details for Sherry Wegner Agency - Glasscock (481490)

| Policy | County | Crop/Plan | Comm Rate | Base Prem | Prod Prem | Fees | Int | Paymts/ Loss Cr | Total Comm | -Due- Comm | Advance |
|-------------|--------|-----------|-----------|-----------|-----------|------|-------|-----------------|------------|------------|---------|
| <i>CROP</i> | | | | | | | | | | | |
| <i>Hail</i> | | | | | | | | | | | |
| <i>MPCI</i> | | | | | | | | | | | |
| | | COTTON | 14.00 | 1,280 | 1,280 | 0 | 0.00 | 1,280.00 | 179.20 | 179.20 | 0.00 |
| | | COTTON | 14.00 | 361 | 361 | 0 | 0.00 | 361.00 | 50.54 | 50.54 | 0.00 |
| | | COTTON | 14.00 | 800 | 800 | 0 | 0.00 | 800.00 | 112.00 | 112.00 | 0.00 |
| | | COTTON | 14.00 | 532 | 532 | 0 | 0.00 | 532.00 | 74.48 | 74.48 | 0.00 |
| | | COTTON | 14.00 | 231 | 231 | 0 | 0.00 | 231.00 | 32.34 | 32.34 | 0.00 |
| | | COTTON | 14.00 | 851 | 851 | 0 | 0.00 | 851.00 | 119.14 | 119.14 | 0.00 |
| | | COTTON | 15.00 | 360 | 360 | 0 | 0.00 | 360.00 | 54.00 | 54.00 | 0.00 |
| | | COTTON | 15.00 | 702 | 702 | 0 | 0.00 | 702.00 | 105.30 | 105.30 | 0.00 |
| | | COTTON | 15.00 | 720 | 720 | 0 | 0.00 | 720.00 | 108.00 | 108.00 | 0.00 |
| | | COTTON | 14.00 | 361 | 361 | 0 | 0.00 | 361.00 | 50.54 | 50.54 | 0.00 |
| | | COTTON | 14.00 | 120 | 120 | 0 | 0.00 | 120.00 | 16.80 | 16.80 | 0.00 |
| | | COTTON | 14.00 | 120 | 120 | 0 | 0.00 | 120.00 | 16.80 | 16.80 | 0.00 |
| | | COTTON | 14.00 | 360 | 360 | 0 | 0.00 | 360.00 | 50.40 | 50.40 | 0.00 |
| | | COTTON | 14.00 | 972 | 972 | 0 | 0.00 | 972.00 | 136.08 | 136.08 | 0.00 |
| | | COTTON | 14.00 | 162 | 162 | 0 | 0.00 | 162.00 | 22.68 | 22.68 | 0.00 |
| | | COTTON | 14.00 | 14,136 | 14,136 | 0 | 0.00 | 14,136.00 | 1,979.04 | 1,979.04 | 0.00 |
| | | COTTON | 14.00 | 96 | 96 | 0 | 0.00 | 96.00 | 13.44 | 13.44 | 0.00 |
| | | COTTON | 14.00 | 396 | 396 | 0 | 0.00 | 396.00 | 55.44 | 55.44 | 0.00 |
| | | COTTON | 14.00 | 552 | 552 | 0 | 0.00 | 552.00 | 77.28 | 77.28 | 0.00 |
| | | COTTON | 14.00 | 810 | 810 | 0 | 0.00 | 810.00 | 113.40 | 113.40 | 0.00 |
| | | COTTON | 14.00 | 90 | 90 | 0 | 0.00 | 90.00 | 12.60 | 12.60 | 0.00 |
| | | WHEAT-CRC | 12.00 | 903 | 370 | 30 | 0.00 | 400.00 | 108.36 | 108.36 | 0.00 |
| | | WHEAT-CRC | 12.00 | 8,333 | 2,596 | 30 | 1.53 | 2,627.53 | 759.96 | 759.96 | 0.00 |
| | | WHEAT-CRC | 12.00 | 20,421 | 8,372 | 30 | 0.00 | 8,402.00 | 2,450.52 | 2,450.52 | 0.00 |
| | | WHEAT-APH | 14.00 | 340 | 122 | 30 | 0.00 | 152.00 | 47.60 | 47.60 | 0.00 |
| | | WHEAT-APH | 14.00 | 1,887 | 607 | 30 | 0.00 | 637.00 | 236.18 | 236.18 | 0.00 |
| | | WHEAT-APH | 14.00 | 1,552 | 559 | 30 | 7.36 | 596.36 | 217.28 | 217.28 | 0.00 |
| | | WHEAT-APH | 14.00 | 91 | 33 | 30 | 0.00 | 63.00 | 12.74 | 12.74 | 0.00 |
| | | WHEAT-APH | 14.00 | 291 | 105 | 30 | 0.29 | 135.29 | 40.74 | 40.74 | 0.00 |
| | | WHEAT-CRC | 12.00 | 2,268 | 816 | 30 | 0.00 | 846.00 | 272.16 | 272.16 | 0.00 |
| | | WHEAT-APH | 14.00 | 342 | 123 | 30 | 0.00 | 153.00 | 47.88 | 47.88 | 0.00 |
| | | WHEAT-APH | 14.00 | 41 | 15 | 30 | 0.56 | 45.56 | 5.74 | 5.74 | 0.00 |
| | | WHEAT-CRC | 12.00 | 1,816 | 745 | 30 | 0.00 | 775.00 | 217.92 | 217.92 | 0.00 |
| | | WHEAT-APH | 14.00 | 1,509 | 543 | 30 | 0.00 | 573.00 | 211.26 | 211.26 | 0.00 |
| | | COTTN-CRC | 12.00 | 8,894 | 2,869 | 30 | 0.00 | 2,899.00 | 1,043.28 | 1,043.28 | 0.00 |
| | | COTTN-CRC | 12.00 | 936 | 309 | 30 | 0.00 | 339.00 | 112.32 | 112.32 | 0.00 |
| | | COTTN-CRC | 12.00 | 10,757 | 3,550 | 30 | 0.00 | 3,580.00 | 1,290.84 | 1,290.84 | 0.00 |
| | | COTTN-CRC | 12.00 | 2,352 | 776 | 30 | 20.16 | 826.16 | 282.24 | 282.24 | 0.00 |
| | | GSORG-CRC | 12.00 | 855 | 283 | 30 | 11.73 | 324.73 | 102.60 | 102.60 | 0.00 |
| | | COTTN-CRC | 12.00 | 5,319 | 1,915 | 30 | 24.31 | 1,969.31 | 638.28 | 638.28 | 0.00 |
| | | COTTN-CRC | 12.00 | 20,675 | 7,443 | 30 | 0.00 | 7,473.00 | 2,481.00 | 2,481.00 | 0.00 |
| | | COTTN-CRC | 12.00 | 51,274 | 18,459 | 30 | 52.31 | 18,541.31 | 6,152.88 | 6,152.88 | 0.00 |
| | | COTTN-CRC | 12.00 | 6,892 | 2,481 | 30 | 0.00 | 2,511.00 | 827.04 | 827.04 | 0.00 |
| | | COTTN-CRC | 12.00 | 2,373 | 783 | 30 | 0.00 | 813.00 | 284.76 | 284.76 | 0.00 |
| | | COTTN-CRC | 12.00 | 1,785 | 642 | 30 | 0.00 | 672.00 | 214.20 | 214.20 | 0.00 |
| | | COTTN-CRC | 12.00 | 1,785 | 642 | 30 | 0.00 | 672.00 | 214.20 | 214.20 | 0.00 |
| | | COTTN-CRC | 12.00 | 2,394 | 790 | 30 | 30.75 | 850.75 | 287.28 | 287.28 | 0.00 |
| | | COTTN-CRC | 12.00 | 1,677 | 553 | 30 | 0.00 | 583.00 | 201.24 | 201.24 | 0.00 |
| | | GSORG-CRC | 12.00 | 545 | 179 | 30 | 0.00 | 209.00 | 65.40 | 65.40 | 0.00 |
| | | COTTN-CRC | 12.00 | 4,452 | 1,603 | 30 | 0.00 | 1,633.00 | 534.24 | 534.24 | 0.00 |
| | | COTTN-CRC | 12.00 | 432 | 143 | 30 | 0.00 | 173.00 | 51.84 | 51.84 | 0.00 |
| | | COTTN-CRC | 12.00 | 49 | 18 | 30 | 0.00 | 46.00 | 5.88 | 5.88 | 0.00 |

2004 Agency Commission Register

For FCIC Accounting Cutoff: March 11, 2005

4/12/2005

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Sherry Wegner Agency - Glasscock (481490)

Details for Sherry Wegner Agency - Glasscock (481490)

| Policy | County | Crop/Plan | Comm Rate | Base Prem | Prod Prem | Fees | Int | Paymts/ Loss Cr | Total Comm | -Due- Comm | Advance |
|--------|--------|-----------|--------------|--------------|--------------|------|-------|--------------------|---------------|---------------|---------|
| | | GSORG-CRC | 12.00 | 24 | 8 | 30 | 0.00 | 38.00 | 2.88 | 2.88 | 0.00 |
| | | COTTN-CRC | 12.00 | 99 | 33 | 30 | 0.00 | 63.00 | 11.88 | 11.88 | 0.00 |
| | | GSORG-CRC | 12.00 | 115 | 38 | 30 | 0.00 | 68.00 | 13.80 | 13.80 | 0.00 |
| | | COTTN-CRC | 12.00 | 27,225 | 8,984 | 30 | 0.00 | 9,014.00 | 3,267.00 | 3,267.00 | 0.00 |
| | | COTTN-CRC | 12.00 | 1,858 | 613 | 30 | 0.00 | 643.00 | 222.96 | 222.96 | 0.00 |
| | | COTTN-CRC | 12.00 | 675 | 223 | 30 | 0.00 | 253.00 | 81.00 | 81.00 | 0.00 |
| | | COTTN-CRC | 12.00 | 1,329 | 545 | 30 | 0.00 | 575.00 | 159.48 | 159.48 | 0.00 |
| | | COTTN-CRC | 12.00 | 3,756 | 1,240 | 30 | 15.88 | 1,285.88 | 450.72 | 450.72 | 0.00 |
| | | GSORG-CRC | 12.00 | 56 | 18 | 30 | 1.20 | 49.20 | 6.72 | 6.72 | 0.00 |
| | | COTTN-CRC | 12.00 | 2,619 | 865 | 30 | 22.38 | 917.38 | 314.28 | 314.28 | 0.00 |
| | | GSORG-CRC | 12.00 | 76 | 25 | 30 | 2.07 | 57.07 | 9.12 | 9.12 | 0.00 |
| | | COTTN-CRC | 12.00 | 4,240 | 1,399 | 30 | 0.00 | 1,429.00 | 508.80 | 508.80 | 0.00 |
| | | COTTN-CRC | 12.00 | 17,383 | 5,737 | 30 | 72.09 | 5,839.09 | 2,085.96 | 2,085.96 | 0.00 |
| | | GSORG-CRC | 12.00 | 332 | 110 | 30 | 3.50 | 143.50 | 39.84 | 39.84 | 0.00 |
| | | COTTN-CRC | 12.00 | 4,767 | 1,716 | 30 | 0.00 | 1,746.00 | 572.04 | 572.04 | 0.00 |
| | | COTTN-CRC | 12.00 | 1,314 | 434 | 30 | 0.00 | 464.00 | 157.68 | 157.68 | 0.00 |
| | | COTTN-CRC | 12.00 | 1,314 | 434 | 30 | 0.00 | 464.00 | 157.68 | 157.68 | 0.00 |
| | | COTTN-CRC | 12.00 | 1,942 | 641 | 30 | 0.00 | 671.00 | 233.04 | 233.04 | 0.00 |
| | | COTTN-CRC | 12.00 | 9,267 | 3,336 | 30 | 0.00 | 3,366.00 | 1,112.04 | 1,112.04 | 0.00 |
| | | COTTN-CRC | 12.00 | 199 | 66 | 30 | 0.00 | 96.00 | 23.88 | 23.88 | 0.00 |
| | | GSORG-CRC | 12.00 | 93 | 31 | 30 | 0.00 | 61.00 | 11.16 | 11.16 | 0.00 |
| | | COTTN-CRC | 12.00 | 2,806 | 1,010 | 30 | 0.00 | 1,040.00 | 336.72 | 336.72 | 0.00 |
| | | COTTN-CRC | 12.00 | 1,269 | 419 | 30 | 0.00 | 449.00 | 152.28 | 152.28 | 0.00 |
| | | COTTN-CRC | 12.00 | 702 | 232 | 30 | 0.00 | 262.00 | 84.24 | 84.24 | 0.00 |
| | | COTTN-CRC | 12.00 | 17,018 | 6,126 | 30 | 76.95 | 6,232.95 | 2,042.16 | 2,042.16 | 0.00 |
| | | COTTN-CRC | 12.00 | 3,057 | 1,100 | 30 | 28.26 | 1,158.26 | 366.84 | 366.84 | 0.00 |
| | | COTTN-CRC | 12.00 | 10,310 | 3,712 | 30 | 93.56 | 3,835.56 | 1,237.20 | 1,237.20 | 0.00 |
| | | COTTN-CRC | 12.00 | 2,195 | 790 | 30 | 20.50 | 840.50 | 263.40 | 263.40 | 0.00 |
| | | COTTN-CRC | 12.00 | 3,166 | 1,045 | 30 | 0.00 | 1,075.00 | 379.92 | 379.92 | 0.00 |
| | | COTTN-CRC | 12.00 | 52,134 | 17,203 | 30 | 0.00 | 17,233.00 | 6,256.08 | 6,256.08 | 0.00 |
| | | COTTN-CRC | 12.00 | 16,651 | 5,495 | 30 | 0.00 | 5,525.00 | 1,998.12 | 1,998.12 | 0.00 |
| | | COTTN-APH | 5.00 | 4,514 | 0 | 100 | 3.75 | 103.75 | 225.70 | 225.70 | 0.00 |
| | | COTTN-CRC | 12.00 | 24,143 | 7,968 | 30 | 0.00 | 7,998.00 | 2,897.16 | 2,897.16 | 0.00 |
| | | GSORG-CRC | 12.00 | 518 | 171 | 30 | 0.00 | 201.00 | 62.16 | 62.16 | 0.00 |
| | | COTTN-APH | 5.00 | 511 | 0 | 100 | 0.00 | 100.00 | 25.55 | 25.55 | 0.00 |
| | | GSORG-CRC | 12.00 | 86 | 28 | 30 | 0.00 | 58.00 | 10.32 | 10.32 | 0.00 |
| | | COTTN-CRC | 12.00 | 14,813 | 5,333 | 30 | 0.00 | 5,363.00 | 1,777.56 | 1,777.56 | 0.00 |
| | | COTTN-CRC | 12.00 | 21,648 | 7,793 | 30 | 0.00 | 7,823.00 | 2,597.76 | 2,597.76 | 0.00 |
| | | COTTN-CRC | 12.00 | 107 | 35 | 30 | 0.00 | 65.00 | 12.84 | 12.84 | 0.00 |
| | | COTTN-CRC | 12.00 | 3,392 | 1,221 | 30 | 0.00 | 1,251.00 | 407.04 | 407.04 | 0.00 |
| | | COTTN-CRC | 12.00 | 6,129 | 2,206 | 30 | 0.00 | 2,236.00 | 735.48 | 735.48 | 0.00 |
| | | COTTN-CRC | 12.00 | 13,433 | 4,836 | 30 | 0.00 | 4,866.00 | 1,611.96 | 1,611.96 | 0.00 |
| | | COTTN-CRC | 12.00 | 1,404 | 463 | 30 | 6.16 | 499.16 | 168.48 | 168.48 | 0.00 |
| | | GSORG-CRC | 12.00 | 69 | 23 | 30 | 1.32 | 54.32 | 8.28 | 8.28 | 0.00 |
| | | COTTN-CRC | 12.00 | 7,061 | 2,330 | 30 | 0.00 | 2,360.00 | 847.32 | 847.32 | 0.00 |
| | | COTTN-CRC | 12.00 | 468 | 155 | 30 | 2.31 | 187.31 | 56.16 | 56.16 | 0.00 |
| | | GSORG-CRC | 12.00 | 23 | 8 | 30 | 0.96 | 38.96 | 2.76 | 2.76 | 0.00 |
| | | COTTN-CRC | 12.00 | 44,548 | 14,700 | 30 | 0.00 | 14,730.00 | 5,345.76 | 5,345.76 | 0.00 |
| | | GSORG-CRC | 12.00 | 189 | 62 | 30 | 0.00 | 92.00 | 22.68 | 22.68 | 0.00 |
| | | COTTN-APH | 5.00 | 8,475 | 0 | 100 | 0.00 | 100.00 | 423.75 | 423.75 | 0.00 |
| | | GSORG-APH | 5.00 | 37 | 0 | 100 | 0.00 | 100.00 | 1.85 | 1.85 | 0.00 |
| | | COTTN-CRC | 12.00 | 407 | 134 | 30 | 0.00 | 164.00 | 48.84 | 48.84 | 0.00 |

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Sherry Wegner Agency - Glasscock (481490)

Details for Sherry Wegner Agency - Glasscock (481490)

| Policy | County | Crop/Plan | Comm Rate | Base Prem | Prod Prem | Fees | Int | Paymts/ Loss Cr | Total Comm | -Due- Comm | Advance |
|--------|--------|-----------|--------------|--------------|--------------|------|--------|--------------------|---------------|---------------|---------|
| | | COTTN-CRC | 12.00 | 407 | 134 | 30 | 0.00 | 164.00 | 48.84 | 48.84 | 0.00 |
| | | COTTN-CRC | 12.00 | 435 | 156 | 30 | 0.00 | 186.00 | 52.20 | 52.20 | 0.00 |
| | | COTTN-CRC | 12.00 | 3,193 | 1,149 | 30 | 0.00 | 1,179.00 | 383.16 | 383.16 | 0.00 |
| | | COTTN-CRC | 12.00 | 435 | 156 | 30 | 4.66 | 190.66 | 52.20 | 52.20 | 0.00 |
| | | COTTN-CRC | 12.00 | 58,566 | 21,084 | 30 | 0.00 | 21,114.00 | 7,027.92 | 7,027.92 | 0.00 |
| | | COTTN-CRC | 12.00 | 14,093 | 4,652 | 30 | 0.00 | 4,682.00 | 1,691.16 | 1,691.16 | 0.00 |
| | | COTTN-CRC | 12.00 | 14,354 | 4,738 | 30 | 0.00 | 4,768.00 | 1,722.48 | 1,722.48 | 0.00 |
| | | COTTN-CRC | 12.00 | 3,261 | 1,174 | 30 | 0.00 | 1,204.00 | 391.32 | 391.32 | 0.00 |
| | R | COTTN-CRC | 12.00 | 8,301 | 2,739 | 30 | 138.44 | 2,907.44 | 996.12 | 996.12 | 0.00 |
| | | COTTN-CRC | 12.00 | 761 | 274 | 30 | 0.00 | 304.00 | 91.32 | 91.32 | 0.00 |
| | | COTTN-CRC | 12.00 | 36,393 | 12,009 | 30 | 0.00 | 12,039.00 | 4,367.16 | 4,367.16 | 0.00 |
| | | COTTN-CRC | 12.00 | 1,210 | 399 | 30 | 0.00 | 429.00 | 145.20 | 145.20 | 0.00 |
| | | COTTN-CRC | 12.00 | 435 | 156 | 30 | 0.00 | 186.00 | 52.20 | 52.20 | 0.00 |
| | | COTTN-APH | 5.00 | 16,677 | 0 | 100 | 0.00 | 100.00 | 833.85 | 833.85 | 0.00 |
| | Y | COTTN-CRC | 12.00 | 72,558 | 29,749 | 30 | 0.00 | 29,779.00 | 8,706.96 | 8,706.96 | 0.00 |
| | | COTTN-CRC | 12.00 | 2,902 | 958 | 30 | 0.00 | 988.00 | 348.24 | 348.24 | 0.00 |
| | | COTTN-CRC | 12.00 | 2,861 | 944 | 30 | 0.00 | 974.00 | 343.32 | 343.32 | 0.00 |
| | | COTTN-CRC | 12.00 | 2,727 | 900 | 30 | 0.00 | 930.00 | 327.24 | 327.24 | 0.00 |
| | | COTTN-CRC | 12.00 | 23,957 | 7,906 | 30 | 0.00 | 7,936.00 | 2,874.84 | 2,874.84 | 0.00 |
| | | COTTN-CRC | 12.00 | 7,905 | 2,608 | 30 | 0.00 | 2,638.00 | 948.60 | 948.60 | 0.00 |
| | | COTTN-CRC | 12.00 | 34,330 | 11,329 | 30 | 0.00 | 11,359.00 | 4,119.60 | 4,119.60 | 0.00 |
| | | COTTN-CRC | 12.00 | 37 | 12 | 30 | 0.00 | 42.00 | 4.44 | 4.44 | 0.00 |
| | | COTTN-CRC | 12.00 | 4,683 | 1,920 | 30 | 0.00 | 1,950.00 | 561.96 | 561.96 | 0.00 |
| | | GSORG-CRC | 12.00 | 144 | 52 | 30 | 0.00 | 82.00 | 17.28 | 17.28 | 0.00 |
| | W | COTTN-CRC | 12.00 | 41,805 | 17,138 | 30 | 214.60 | 17,382.60 | 5,016.60 | 5,016.60 | 0.00 |
| | | COTTN-CRC | 12.00 | 64 | 26 | 30 | 0.00 | 56.00 | 7.68 | 7.68 | 0.00 |
| | | COTTN-CRC | 12.00 | 37 | 12 | 30 | 0.00 | 42.00 | 4.44 | 4.44 | 0.00 |
| | X | COTTN-CRC | 12.00 | 7,725 | 2,549 | 30 | 0.00 | 2,579.00 | 927.00 | 927.00 | 0.00 |
| | | COTTN-CRC | 12.00 | 37 | 12 | 30 | 0.00 | 42.00 | 4.44 | 4.44 | 0.00 |
| | C | COTTN-CRC | 12.00 | 1,693 | 559 | 30 | 0.00 | 589.00 | 203.16 | 203.16 | 0.00 |
| | | GSORG-CRC | 12.00 | 114 | 38 | 30 | 0.00 | 68.00 | 13.68 | 13.68 | 0.00 |
| | | COTTN-APH | 5.00 | 1,525 | 0 | 100 | 0.00 | 100.00 | 76.25 | 76.25 | 0.00 |
| | | COTTN-APH | 5.00 | 2,107 | 0 | 100 | 0.00 | 100.00 | 105.35 | 105.35 | 0.00 |
| | | COTTN-CRC | 12.00 | 28,048 | 9,255 | 30 | 232.12 | 9,517.12 | 3,365.76 | 3,365.76 | 0.00 |
| | | GSORG-CRC | 12.00 | 642 | 212 | 30 | 9.09 | 251.09 | 77.04 | 77.04 | 0.00 |
| | P | COTTN-CRC | 12.00 | 28,686 | 9,467 | 30 | 0.00 | 9,497.00 | 3,442.32 | 3,442.32 | 0.00 |
| | | COTTN-CRC | 12.00 | 1,723 | 620 | 30 | 17.43 | 667.43 | 206.76 | 206.76 | 0.00 |
| | | COTTN-CRC | 12.00 | 11,509 | 3,797 | 30 | 0.00 | 3,827.00 | 1,381.08 | 1,381.08 | 0.00 |
| | | COTTN-CRC | 12.00 | 5,617 | 1,853 | 30 | 0.00 | 1,883.00 | 674.04 | 674.04 | 0.00 |
| | | GSORG-CRC | 12.00 | 63 | 21 | 30 | 0.00 | 51.00 | 7.56 | 7.56 | 0.00 |
| | | COTTN-CRC | 12.00 | 3,011 | 994 | 30 | 0.00 | 1,024.00 | 361.32 | 361.32 | 0.00 |
| | | COTTN-CRC | 12.00 | 2,000 | 720 | 30 | 0.00 | 750.00 | 240.00 | 240.00 | 0.00 |
| | | COTTN-APH | 5.00 | 4,883 | 0 | 100 | 0.00 | 100.00 | 244.15 | 244.15 | 0.00 |
| | | COTTN-CRC | 12.00 | 35,229 | 12,682 | 30 | 0.00 | 12,712.00 | 4,227.48 | 4,227.48 | 0.00 |
| | | COTTN-CRC | 12.00 | 68,182 | 27,955 | 30 | 0.00 | 27,985.00 | 8,181.84 | 8,181.84 | 0.00 |
| | | WHEAT-APH | 14.00 | 4 | 2 | 30 | 0.00 | 32.00 | 0.56 | 0.56 | 0.00 |
| | | WHEAT-APH | 14.00 | 4 | 2 | 30 | 0.00 | 32.00 | 0.56 | 0.56 | 0.00 |
| | | WHEAT-APH | 14.00 | 754 | 272 | 30 | 0.00 | 302.00 | 105.56 | 105.56 | 0.00 |
| | | WHEAT-APH | 14.00 | 45 | 16 | 30 | 0.00 | 46.00 | 6.30 | 6.30 | 0.00 |
| | | WHEAT-CRC | 12.00 | 52 | 21 | 30 | 0.00 | 51.00 | 6.24 | 6.24 | 0.00 |
| | | WHEAT-APH | 14.00 | 3,521 | 1,268 | 30 | 0.00 | 1,298.00 | 492.94 | 492.94 | 0.00 |
| | | WHEAT-APH | 14.00 | 224 | 81 | 30 | 0.00 | 111.00 | 31.36 | 31.36 | 0.00 |

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Sherry Wegner Agency - Glascock (481490)

Details for Sherry Wegner Agency - Glascock (481490)

| Policy | County | Crop/Plan | Comm Rate | Base Prem | Prod Prem | Fees | Int | Paymts/ Loss Cr | Total Comm | -Due- Comm | Advance |
|--------|--------|-----------|--------------|--------------|--------------|----------|------------|--------------------|---------------|---------------|---------|
| | | WHEAT-CRC | 12.00 | 794 | 326 | 30 | 0.00 | 356.00 | 95.28 | 95.28 | 0.00 |
| | | WHEAT-CRC | 12.00 | 850 | 306 | 30 | 0.00 | 336.00 | 102.00 | 102.00 | 0.00 |
| | | WHEAT-APH | 14.00 | 224 | 81 | 30 | 0.00 | 111.00 | 31.36 | 31.36 | 0.00 |
| | | WHEAT-APH | 14.00 | 4 | 2 | 30 | 0.00 | 32.00 | 0.56 | 0.56 | 0.00 |
| | | WHEAT-APH | 14.00 | 224 | 81 | 30 | 0.00 | 111.00 | 31.36 | 31.36 | 0.00 |
| | | WHEAT-APH | 14.00 | 2,484 | 894 | 30 | 0.00 | 924.00 | 347.76 | 347.76 | 0.00 |
| | | WHEAT-APH | 14.00 | 8,373 | 3,014 | 30 | 0.00 | 3,044.00 | 1,172.22 | 1,172.22 | 0.00 |
| | | WHEAT-APH | 14.00 | 16,403 | 5,905 | 30 | 0.00 | 5,935.00 | 2,296.42 | 2,296.42 | 0.00 |
| | | WHEAT-APH | 14.00 | 177 | 64 | 30 | 0.00 | 84.00 | 24.78 | 24.78 | 0.00 |
| | | WHEAT-APH | 14.00 | 2,276 | 934 | 30 | 0.00 | 964.00 | 318.92 | 318.92 | 0.00 |
| | | WHEAT-APH | 14.00 | 171 | 62 | 30 | 0.00 | 92.00 | 23.94 | 23.94 | 0.00 |
| | | WHEAT-APH | 14.00 | 328 | 135 | 30 | 0.00 | 165.00 | 45.92 | 45.92 | 0.00 |
| | | WHEAT-APH | 14.00 | 1,698 | 561 | 30 | 0.00 | 691.00 | 237.86 | 237.86 | 0.00 |
| | | WHEAT-APH | 14.00 | 4,410 | 1,808 | 30 | 0.00 | 1,838.00 | 617.40 | 617.40 | 0.00 |
| | | WHEAT-CRC | 12.00 | 2,381 | 977 | 30 | 0.00 | 1,007.00 | 285.72 | 285.72 | 0.00 |
| | | WHEAT-APH | 14.00 | 8,084 | 3,314 | 30 | 4.51 | 3,348.51 | 1,131.76 | 1,131.76 | 0.00 |
| | | WHEAT-APH | 14.00 | 28 | 10 | 30 | 0.00 | 40.00 | 3.92 | 3.92 | 0.00 |
| | | WHEAT-APH | 14.00 | 34 | 12 | 30 | 0.00 | 42.00 | 4.76 | 4.76 | 0.00 |
| | | WHEAT-APH | 14.00 | 61 | 20 | 30 | 0.00 | 50.00 | 8.54 | 8.54 | 0.00 |
| | | WHEAT-APH | 14.00 | 508 | 167 | 30 | 0.00 | 197.00 | 71.12 | 71.12 | 0.00 |
| | | COTTN-CRC | 12.00 | 7,405 | 2,444 | 30 | 61.86 | 2,635.86 | 888.60 | 888.60 | 0.00 |
| | | COTTN-CRC | 12.00 | 8,411 | 2,776 | 30 | 70.16 | 2,876.16 | 1,009.32 | 1,009.32 | 0.00 |
| | | COTTN-CRC | 12.00 | 57 | 19 | 30 | 0.00 | 49.00 | 6.84 | 6.84 | 0.00 |
| | | GSORG-CRC | 12.00 | 18 | 6 | 30 | 0.00 | 36.00 | 2.16 | 2.16 | 0.00 |
| | | COTTN-APH | 5.00 | 559 | 0 | 100 | 0.00 | 100.00 | 27.95 | 27.95 | 0.00 |
| | | COTTN-CRC | 12.00 | 8,780 | 3,592 | 30 | 90.66 | 3,712.56 | 1,051.20 | 1,051.20 | 0.00 |
| | | COTTN-CRC | 12.00 | 144,997 | 52,198 | 30 | 0.00 | 52,228.00 | 17,399.64 | 17,399.64 | 0.00 |
| | | COTTN-CRC | 12.00 | 7,235 | 2,605 | 30 | 0.00 | 2,635.00 | 868.20 | 868.20 | 0.00 |
| | | COTTN-CRC | 12.00 | 7,235 | 2,605 | 30 | 0.00 | 2,635.00 | 868.20 | 868.20 | 0.00 |
| | | COTTN-CRC | 12.00 | 2,405 | 865 | 30 | 0.00 | 895.00 | 288.60 | 288.60 | 0.00 |
| REV: | | | 1,202,149 | 429,277 | 3,750 | 1,326.86 | 434,353.85 | 144,257.88 | 144,257.88 | 0.00 | |
| MPCI: | | | 55,895 | 20,812 | 930 | 12.72 | 21,754.72 | 7,825.30 | 7,825.30 | 0.00 | |
| CAT: | | | 39,288 | 0 | 900 | 3.75 | 903.75 | 1,964.40 | 1,964.40 | 0.00 | |